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HENINGER GARRISON DAVIS, LLC Attorneys for Plaintiff JOAO CONTROL & MONITORING SYSTEMS, LLC 5 Penn Plaza, 23rd Floor New York, New York 10001 (212) 896-3876

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOAO CONTROL & MONITORING SYSTEMS, LLC,

ECF CASE

Civil No. 1:13-CV-00053-TPG-JCF

v.

CHRYSLER GROUP LLC,

Jury Trial Demanded

Defendant.

NOTICE OF PLAINTIFF JOAO CONTROL & MONITORING SYSTEMS, LLC'S INTENT TO FILE A MOTION FOR RECONSIDERATION, OR IN THE ALTERNATIVE, DEFERMENT UNTIL AFTER SERVICE OF INVALIDITY CONTENTIONS

PLEASE TAKE NOTICE that Plaintiff Joao Control & Monitoring Systems, LLC hereby moves this Court to reconsider the decision granting Defendant Chrysler Group, LLC's Motion to Transfer Venue, or in the alternative to defer transfer of this case until after September 25, 2013, the date for completion of the document production accompanying Chrysler Group, LLC's invalidity contentions.

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Respectfully submitted this 30th day of August, 2013.

New York, New York

/s/ Maureen V. Abbey

Maureen V. Abbey

HENINGER GARRISON DAVIS, LLC

NY Bar No. MA-1562 5 Penn Plaza, 23rd Floor New York, New York 10001 Telephone: (212) 896-3876

Facsimile: (646) 378-2001

E-mail: maureen@hgdlawfirm.com

Attorney for Plaintiff
JOAO CONTROL & MONITORING
SYSTEMS, LLC

Any meties for meansilmaths Shall be filed consistent with the local rules.

9/3/13 La II. Form

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing papers are being served on Defendant's counsel CM/ECF which will send an electronic mail to the attorneys of record in accordance with the Local Rules and Federal Rules of Civil Procedure.

/s/ Maureen V. Abbey
Maureen V. Abbey